

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

DAVID PINKOSKI, Derivatively on Behalf of) Case No. 3:15-cv-00463-JAG
GENWORTH FINANCIAL, INC.,)
Plaintiff,)
v.)
THOMAS J. MCINERNEY, MARTIN P.)
KLEIN, WILLIAM H. BOLINDER, G. KENT)
CONRAD, MELINA E. HIGGINS, NANCY J.)
KARCH, CHRISTINE B. MEAD, DAVID M.)
MOFFETT, THOMAS E. MOLONEY, JAMES)
A. PARKE, JEROME UPTON, JAMES S.)
RIEPE, and MICHAEL D. FRAIZER,)
Defendants,)
– and –)
GENWORTH FINANCIAL, INC., a Delaware)
corporation,)
Nominal)
Defendant.)

MARTIN COHEN, Derivatively on Behalf of) Case No. 3:15-cv-00504-JAG
GENWORTH FINANCIAL, INC.,)
Plaintiff,)
v.)
THOMAS J. MCINERNEY, MARTIN P.)
KLEIN, WILLIAM H. BOLINDER, G. KENT)
CONRAD, MELINA E. HIGGINS, NANCY J.)
KARCH, CHRISTINE B. MEAD, DAVID M.)
MOFFETT, THOMAS E. MOLONEY, JAMES)
A. PARKE, and JAMES S. RIEPE,)
Defendants,)
– and –)
GENWORTH FINANCIAL, INC.,)
Nominal)
Defendant.)

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RICHARD L. SALBERG, M.D., Derivatively) Case No. 3:15-cv-00517-JAG
on Behalf of Genworth Financial, Inc.,)
Plaintiff,)
v.)
THOMAS J. McINERNEY, MARTIN P.)
KLEIN, MICHAEL D. FRAZIER, WILLIAM)
H. BOLINDER, G. KENT CONRAD,)
MELINA E. HIGGINS, NANCY J. KARCH,)
CHRISTINE B. MEAD, DAVID M.)
MOFFETT, THOMAS E. MOLONEY, JAMES)
A. PARKE, and JAMES S. RIEPE,)
Defendants,)
– and –)
GENWORTH FINANCIAL, INC.,)
Nominal)
Defendant.)

**PLAINTIFFS DAVID PINKOSKI AND RICHARD L. SALBERG, M.D.'S
MOTION TO CONSOLIDATE RELATED ACTIONS AND TO APPOINT
LEAD PLAINTIFFS AND TO APPROVE LEAD PLAINTIFFS'
SELECTION OF CO-LEAD AND LIAISON COUNSEL**

Plaintiffs David Pinkoski and Richard L. Salberg, M.D. move respectfully this Court to consolidate the related actions and to appoint lead plaintiffs and to approve selection of co-lead and liaison counsel. In support of their motion, Plaintiffs refer this Court to their supporting Memorandum of Law and the Declaration of Jeffrey H. Geiger, Esquire, filed simultaneously herewith. A Proposed Order is attached herewith.

WHEREFORE, for the reasons stated in the accompanying Memorandum of Law, Plaintiffs specifically request that this Court grant their motion.

Dated: September 9, 2015

By: /Jeffrey Geiger/
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Counsel for Plaintiff David Pinkoski

CERTIFICATE OF SERVICE

I certify that on September 9, 2015, I electronically filed the foregoing with the Clerk of this Court using the CM/ECF system, which will send notification of such filing (NEF) to all CM/ECF registered attorneys indicated on the NEF.

SANDS ANDERSON PC

/s/ Jeffrey Hamilton Geiger

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